

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
AMARILLO DIVISION**

DR. RONNY JACKSON, STUART and ROBBIE
FORCE, and SARRI SINGER,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as the President of the United States,
and ANTONY BLINKEN, in his official capacity
as the United States Secretary of State,

No. 2:22-cv-00241-Z

Defendants.

**CONSENT MOTION FOR LEAVE TO FILE A FIRST AMENDED
COMPLAINT AND RESET THE ANSWER DEADLINE**

The Plaintiffs file this consent motion for an order granting leave to file a First Amended Complaint and to reset the deadline for the Defendants to file their responsive pleading to 45 days after it is filed. In support thereof, the Plaintiffs state as follows:

1. FED. R. CIV. P. 15(a)(2) authorizes the relief requested in this motion. *See Sells v. Corely*, No. 2:20-CV-12-Z-BQ, 2020 WL 4035177, at *2 (N.D. Tex. July 16, 2020) (Kacsmayk, J.).

2. This case was filed on December 20, 2022.

3. On October 7, 2023, terrorists invaded Israel. They murdered, kidnapped, and raped over twelve hundred innocent civilians. ECF No. 38 at 6. The proposed First Amended Complaint contains new allegations about this attack and its aftermath.

4. Also, the parties jointly request that the Court reset the deadline for the Defendants to file their answer or responsive pleading to forty-five days after the First Amended Complaint is deemed filed. On February 14, 2024, the Court ordered the Defendants to answer on or before April 16, 2024. ECF No. 40. The parties believe this enlargement of time is appropriate so that the Defendants have sufficient time to address the Plaintiffs' new allegations.

WHEREFORE, the Plaintiffs respectfully request that the Court grant this consent motion, order the Clerk of Court to file the First Amended Complaint, attached hereto in accordance with Local Civil Rule 15.1(b), and the parties jointly respectfully request that the Court grant the Defendants forty-five days thereafter to answer or otherwise plead.

Dated: March 22, 2024

Respectfully submitted,

/s/ Michael Ding

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CERTIFICATE OF CONFERENCE

I certify that on March 22, 2024, I conferred with the Defendants' counsel, who represented that the Defendants consent this motion.

/s/ Michael Ding
Michael Ding

CERTIFICATE OF SERVICE

I certify that on March 22, 2024, a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) and served on all counsel of records.

/s/ Michael Ding
Michael Ding